

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

*Plaintiff,*

v.

SAMSUNG ELECTRONICS CO., LTD.;  
and SAMSUNG ELECTRONICS  
AMERICA, INC.,

*Defendants.*

Civil Action No. 2:22-cv-00422-JRG-RSP

**JURY DEMANDED**

**JOINT MOTION FOR ENTRY OF AGREED  
ORDER REGARDING E-DISCOVERY**

Pursuant to the Discovery Order (D.I. 56) setting a deadline to file a proposed Order Regarding E-Discovery, Plaintiff Headwater Research, LLC (“Headwater”) and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Defendants” or “Samsung”), (collectively, the “Parties”) hereby jointly request that the Court enter the proposed Order Regarding E-Discovery.

Dated: April 19, 2023

/s/ Andria Rae Crisler

Ruffin B. Cordell  
TX Bar No. 04820550  
Michael J. McKeon  
DC Bar No. 459780  
mckeon@fr.com  
Jared Hartzman (*pro hac vice*)  
DC Bar No. 1034255  
hartzman@fr.com  
Joshua Carrigan (*pro hac vice*)  
VA Bar No. 96911  
carrigan@fr.com  
FISH & RICHARDSON P.C.  
1000 Maine Avenue, SW, Ste 1000  
Washington, D.C. 20024  
Telephone: (202) 783-5070  
Facsimile: (202) 783-2331

Thad C. Kodish  
GA Bar No. 427603  
tkodish@fr.com  
Benjamin K. Thompson  
GA Bar No. 633211  
bthompson@fr.com  
Nicholas A. Gallo (*pro hac vice*)  
GA Bar No. 546590  
gallo@fr.com  
Steffen Lake (*pro hac vice*)  
GA Bar No. 512272  
lake@fr.com  
FISH & RICHARDSON P.C.  
1180 Peachtree St. NE, Fl. 21  
Atlanta, GA 30309  
Telephone: (404) 892-5005  
Facsimile: (404) 892-5002

Leonard E. Davis  
TX Bar No. 05521600  
ldavid@fr.com  
Andria Rae Crisler  
TX Bar No. 24093792  
crisler@fr.com

Respectfully submitted,

/s/ Marc Fenster

Marc Fenster  
CA State Bar No. 181067  
Reza Mirzaie  
CA State Bar No. 246953  
Brian Ledahl  
CA State Bar No. 186579  
Ben Wang  
CA State Bar No. 228712  
Paul Kroeger  
CA State Bar No. 229074  
Neil A. Rubin  
CA State Bar No. 250761  
Kristopher Davis  
CA State Bar No. 329627  
James S. Tsuei  
CA State Bar No. 285530  
Philip Wang  
CA State Bar No. 262239  
Amy Hayden  
CA State Bar No. 287026  
James Milkey  
CA State Bar No. 281283  
Jason M. Wietholter  
CA State Bar No. 337139  
RUSS AUGUST & KABAT  
12424 Wilshire Blvd. 12th Floor  
Los Angeles, CA 90025  
Telephone: 310-826-7474  
rak\_headwater@raklaw.com

Robert Christopher Bunt  
Parker, Bunt & Ainsworth, P.C.  
Texas State Bar No. 00787165  
100 E. Ferguson Suite 418  
Tyler, Texas 75702  
Tel.: (903) 531-3535  
rcbunt@pbatyler.com

**ATTORNEYS FOR PLAINTIFF,  
Headwater Research LLC**

FISH & RICHARDSON P.C.  
1717 Main Street, Suite 5000  
Dallas, TX 75201  
Telephone: (214)747-5070  
Facsimile: (214) 747-2091

John-Paul R. Fryckman (*pro hac vice*)  
CA Bar No. 317591  
FISH & RICHARDSON P.C.  
12860 El Camino Real, Ste. 400  
San Diego, CA 92130  
Telephone: (858) 678-5070  
Facsimile: (858) 678-5099

Melissa R. Smith  
State Bar No. 24001351  
Melissa@gillamsmithlaw.com  
GILLAM & SMITH, LLP  
303 South Washington Avenue  
Marshall, Texas 75670  
Telephone: (903) 934-8450  
Facsimile: (903) 934-9257

Andrew Thompson (“Tom”) Gorham  
State Bar No. 24012715  
tom@gillamsmithlaw.com  
GILLAM & SMITH, LLP  
102 N. College, Ste. 800  
Tyler, Texas 75702  
Telephone: (903) 934-8450  
Facsimile: (903) 934-9257

*Attorneys for Defendants  
Samsung Electronics Co., Ltd. and  
Samsung Electronics America, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 19<sup>th</sup> day of April 2023, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Marc Fenster

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). The parties are in agreement on filing this Joint Motion.

/s/ Jason Wietholter